



PETER A. GWYNNE

Partner

212-393-4250 PHONE

pgwynne@danyaperryllaw.com EMAIL

October 22, 2024

VIA ECF

The Honorable Jessica G. L. Clarke
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Courtroom 20C
New York, NY 10007-1312

**Re: *Doe v. Black*, No. 1:23-cv-06418-JGLC – Letter-Motion for Leave to File
with Redactions**

Dear Judge Clarke:

We represent defendant Leon Black in this matter. Pursuant to Your Honor’s Individual Rule 5(d)(ii), we respectfully request leave to file the joint letter submitted in accordance with the Court’s Memorandum Endorsement (ECF No. 121), with redactions.

The parties met and conferred regarding the issues discussed in the joint letter on October 18, 2024. On October 22, 2024, we provided Plaintiff’s counsel with a copy of the draft joint letter and allowed them the opportunity to review it. Plaintiff initially demanded that the entire letter be filed under seal, and threatened to “contact[] chambers and ask[] for emergency sealing” if the letter were filed on the docket.

After we asked Plaintiff’s counsel what portions of the letter specifically required sealing and the grounds that they believed justified sealing, counsel replied by proposing redactions without providing any reason why the proposed redactions were appropriate or justified. We again asked counsel to provide a reason for making the proposed redactions when we informed them that we would file the letter with their requested redactions. Counsel again refused to answer.

We have reviewed the proposed redactions and see no reason that information should be hidden from the public. The information Plaintiff seeks to redact has already been (or soon will be) shared with third parties, and there is nothing about the redacted information that could reveal Plaintiff’s identity, or quotes from or characterizes previously sealed material. There is absolutely no justification that permits this material to be sealed.

Pursuant to Individual Rule 5(d)(iii), we have filed an unredacted version of the letter under seal that shows Plaintiff’s proposed redactions in highlight. We have also publicly filed a copy of the letter with all of Plaintiff’s proposed redactions included.

The Honorable Jessica G. L. Clarke
October 22, 2024

With this letter, we place Plaintiff on notice that, pursuant to Individual Rule 5(d)(i), she has three business days to file a letter explaining the need to redact the document. We also respectfully request that the Court rule on this letter-motion at the initial pretrial conference on October 29, 2024.

Respectfully submitted,

/s/ Peter A. Gwynne